

Application of Blue Casa Telephone, LLC

For a Certificate of Public Convenience and
Necessity to Provide Interexchange and Local
Exchange Telecommunications ServicesBEFORE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2019 -119 - C

(Please type or print)

Submitted by: Lance J.M. Steinhart, P.C.

SC Bar Number: _____

Address: 1725 Windward Concourse, Ste. 150
Alpharetta, Georgia 30005Telephone: (770) 232-9200Fax: (770) 232-9208

Other: _____

Email: info@telecomcounsel.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition expeditiously ☐ Request for item to be placed on Commission's Agenda
☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input checked="" type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

RECEIVED

MAY 28 2019

PSC SC
MAIL / DMS

Lance J.M. Steinhart, P.C.
Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: info@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

May 24, 2019

VIA OVERNIGHT DELIVERY

Chief Clerk of the Commission
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
(803) 896-5100

Re: Blue Casa Telephone, LLC
Docket No. 2019-119-C

Dear Sir/Ma'am,

Enclosed please find for filing an original and one (1) copy of Blue Casa Telephone, LLC's pre-filed testimony.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided. If you have any questions or if we may provide you with any additional information, please do not hesitate to contact my office. Thank you. *he*

Respectfully submitted,



Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Blue Casa Telephone, LLC

Enclosures

cc: Scott Elliot, Esq.

RECEIVED

MAY 28 2019

**PSC SC
MAIL / DMS**

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019-119-C**

In the Matter of)	
)	
The Application of)	
Blue Casa Telephone, LLC)	
)	DIRECT TESTIMONY
For a Certificate of Public)	OF JEFF COMPTON
Convenience and Necessity to)	
Provide Interexchange and Local)	
Exchange Telecommunications Services)	

I. Introduction

1. **Q. Please state your name and business address.**
 - A. My name is Jeff Compton. My business address is 114 E. Haley Street, Suite A, Santa Barbara, California 93101.
2. **Q. By whom are you employed and in what capacity?**
 - A. I am the President of Blue Casa Telephone, LLC ("Blue Casa" or "Applicant").
3. **Q. Please give a brief description of your background and experience in business and telecommunications.**
 - A. See Exhibit D to our application.

RECEIVED

MAY 28 2019

PSC SC
MAIL / DMS

1 4. **Q. What is the purpose of your testimony?**

2 A. The purpose of my testimony is to describe the nature of Blue Casa's proposed
3 service offering within the State of South Carolina, and to demonstrate its financial,
4 managerial, and technical ability to provide the telecommunications services for
5 which authority is sought herein.

6 5. **Q. Do you wish to incorporate by reference any documents into your testimony?**

7 A. Yes. I wish to incorporate by reference Blue Casa's Application for a Certificate of
8 Public Convenience and Necessity to Provide Interexchange and Local Exchange
9 Telecommunications Services (the "Application") filed in this docket and its
10 associated exhibits.

11 **II. The Business of Blue Casa**

12 6. **Q. Has Blue Casa registered to do business in South Carolina?**

13 A. Yes. Blue Casa is a California Limited Liability Company that has received
14 authorization to transact business within the State of South Carolina. A copy of
15 Blue Casa's Articles of Organization is attached to the Application as Exhibit A and
16 a copy of the document of authorization from the South Carolina Secretary of State
17 is attached to the Application as Exhibit B.

7. **Q. Please describe the services Blue Casa intends to provide within the State of South Carolina.**

A. Blue Casa may offer a full array of services to both business and residential customers, including the following:

Interexchange (switched and dedicated services):

- a. 1+ and 101XXXX outbound dialing;
- b. 800/888 toll-free inbound dialing;

Local Exchange:

- a. Local Exchange Services for business and residence customers that will enable customers to originate and terminate local calls in the local calling area served by other LECs, including local dial tone and custom calling features.
- b. Switched local exchange services, including basic service, trunks, carrier access, and any other switched local services that currently exist or will exist in the future.
- c. Non-switched local services (e.g., private line) that currently exist or will exist in the future.
- d. Centrex and/or Centrex-like services that currently exist or will exist in the future.
- e. Digital subscriber line, ISDN, and other high capacity services.

Blue Casa seeks authority to resell and provide through its own facilities local exchange services throughout the State primarily in the areas served by the incumbent local exchange carrier. Applicant's local calling areas initially will coincide with the incumbent local exchange carrier's local calling areas. Upon its entry into the South Carolina market, Blue Casa may install equipment for the provision of local exchange services. Blue Casa may use the following or similar configuration of equipment: Blue Casa will provide voice and high speed data services through a combination of the latest technology switching and transport media. The switching system will consist of a central processing and control complex capable of interconnection as a peer to the incumbent as well as

competitive local exchange companies. The hub portion of the switch will interconnect with the public switched network on Signaling System 7 ("SS7") or Feature Group D ("FGD") facilities. The system's remote module capability will allow properties to be served in a manner that provides the exchange of appropriate signaling, control and calling/caller information to the network in accordance with network standards and specifications. Additionally, these services will be delivered over a combination of delivery mechanisms through incumbent local carriers' unbundled loop network, both copper and fiber and transport networks, as well as via Applicant constructed facilities. Its services will be available on a full-time basis, twenty-four hours a day, seven days a week, to customers within the geographic boundaries of the State of South Carolina. Customers will be billed by Blue Casa. Applicant is committed to providing access to a local operator, directory assistance, 911 services, and dual relay services. Applicant is also willing to accept its obligations to collect 911 and dual relay service surcharges from its local exchange customers, and to remit those funds to the appropriate authorities. Blue Casa does not intend to engage in telemarketing in the State of South Carolina.

8. **Q. Does Blue Casa have authorization to provide intrastate telecommunications services in any other state?**

A. Yes, Blue Casa was granted a Certificate of Convenience and Necessity to provide resold and limited facilities-based local exchange services and resold and limited facilities-based interexchange services in the State of California by Decision 12-02-009 issued on February 3, 2012, in Application No. 11-08-016; Blue Casa was

1 designated an Eligible Telecommunications Carrier ("ETC") by the California
 2 Public Utilities Commission in Resolution T-17384 issued on December 21, 2012.
 3 Blue Casa is also authorized to provide resold and facilities-based local exchange
 4 and long distance service in Kentucky (CLEC Utility No. 5057900 and IXC Utility
 5 No. 5179970), Georgia (CLEC Docket No. 42412 and IXC Docket No 42413), and
 6 Louisiana (Docket No. S-35138).

7 Blue Casa is in the process of obtaining authority to operate as a competitive
 8 local exchange and long distance provider in Alabama, Arkansas, Mississippi, and
 9 North Carolina; and has applications pending for designation as an ETC in Georgia
 10 and Louisiana.

11 9. Q. **Has Blue Casa ever had an application for a certificate of public convenience**
 12 **and necessity denied?**

13 A. No.

14 10. Q. **Does Blue Casa intend to file a tariff with the Commission?**

15 A. Yes. Blue Casa filed an interexchange tariff as Exhibit F and illustrative local price
 16 list as Exhibit E to its Application. We believe Blue Casa's Tariff and price list will
 17 comport with all Orders, Rules, and Regulations of the Commission. Blue Casa
 18 agrees to modify its tariffs, if necessary, at the direction of the Commission.

19 11. Q. **Will Blue Casa comply with the Commission's orders regarding the provision**
 20 **of interexchange and local services?**

21 A. Yes. Blue Casa will provide and market services in accordance with current
 22 Commission policies. In particular, Blue Casa is familiar with Commission Order
 23 No. 93-462 regarding resale of intraLATA telecommunications services and will
 24 attempt to comply with the terms of that order in every respect possible. In addition,
 25 Blue Casa at all times will provide interstate services in compliance with all FCC
 26 rules and regulations. Blue Casa will at all times provide and market services in

1 accordance with current Commission policies and will attempt to comply with the
2 terms of that order in every respect possible.

3 12. **Q. Has Blue Casa provided any intrastate telecommunications services within the**
4 **State of South Carolina?**

5 A. No, it has not.

6 13. **Q. What rates will Blue Casa charge upon receipt of certification?**

7 A. Blue Casa will charge the tariffed rates approved by the Commission.

8 14. **Q. How will Blue Casa market services in South Carolina?**

9 A. Blue Casa intends to market its services via direct sales by Blue Casa's employees.

10 **III. Managerial, Technical and Financial Qualifications**

11 15. **Q. Does Blue Casa have sufficient managerial, technical, and financial resources**
12 **and ability to provide the telecommunications services proposed in its**
13 **Application?**

14 A. Yes. Blue Casa has sufficient technical, financial, and managerial resources and
15 ability to provide the telecommunications services for which authority is sought
16 herein. Blue Casa's personnel represent a broad spectrum of business and technical
17 disciplines, possessing many years of individual and aggregate telecommunications
18 experience.

19 The qualifications and experience of Blue Casa's key management team are
20 discussed on Exhibit D which is attached to our Application in support of
21 Applicant's managerial and technical ability to provide the services for which
22 authority is sought herein.
23

1 16. **Q. How does Blue Casa handle customer service requests?**

2 A. Blue Casa's customer service representatives are available to assist its customers
3 and will promptly respond to all customer inquiries. Customers may call (866)
4 566-2583 or a local number. The applicable toll free or local numbers will be
5 printed on customers' monthly billing statements. Alternately, customers wishing
6 to communicate with a Blue Casa customer service representative in writing may
7 send written correspondence to Blue Casa at:

8
9 Blue Casa Telephone, LLC
10 ATTN: Customer Service
11 114 E. Haley Street, Suite A
12 Santa Barbara, California 93101

13 Blue Casa's customer service representatives are prepared to respond to a broad
14 range of service matters, including inquiries regarding: (1) the types of services
15 offered by Blue Casa and the rates associated with such services; (2) monthly
16 billing statements; (3) problems or concerns pertaining to a customer's current
17 service; and (4) general service matters.

18 17. **Q. Please describe the financial condition of Blue Casa.**

19 A. In support of Blue Casa's financial ability to provide the services sought herein,
20 copies of Blue Casa's financial information was submitted as Exhibit C to its
21 Application.
22

1 IV. Public Interest

2 18. Q. **How will residents of South Carolina benefit from Blue Casa's services and**
 3 **presence in South Carolina?**

4 A. The Commission's grant of this certificate is in the public interest because
 5 consumers of telecommunications services within Blue Casa's service territory will
 6 receive increased choice, improved quality of service, and heightened opportunities
 7 to obtain improved technology in the homes and businesses. Market incentives for
 8 new and old telecommunications providers in South Carolina will be improved
 9 greatly through an increase in the diversity of suppliers and competition within the
 10 local exchange telecommunications market. Consistent with the Commission's
 11 intent to aid in the development of a competitive telecommunications environment
 12 in South Carolina, the granting of a certificate of authority to provide local exchange
 13 service will offer increased efficiency to the State's telecommunications
 14 infrastructure through greater reliability of services and an increase in competitive
 15 choices.

16
 17 19. Q. **Has the Company ever been the subject of an investigation by any state**
 18 **Regulatory body or by the FCC?**

19 A. No.

20 20. Q. **Will the Company agree to abide by and comply with Commission**
 21 **Rules and Regulations and Commission Orders in its operations in South**
 22 **Carolina?**

23 A. Yes.
 24
 25
 26

1 21. **Q. Does this conclude your testimony?**

2 A. Yes. I would like to thank the Commission for this opportunity to provide
3 information relevant to Blue Casa's Application and am ready to provide any
4 additional information that the Commission may need in making its decision.

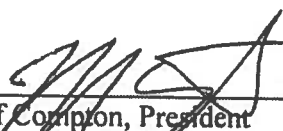
5

State of California)
)
 County of Santa Barbara)

VERIFICATION

Personally appeared before the undersigned, an officer duly authorized to administer oaths, I, Jeff Compton, first being duly sworn, depose and state that I am President of Blue Casa Telephone, LLC ("Blue Casa" or the "Company") and do hereby declare under penalty of perjury that I have read my Direct Testimony and know the contents thereof, which was filed in support of Blue Casa's Application for Certificate of Public Convenience and Necessity to Provide Interexchange and Local Exchange Telecommunications Services in the State of South Carolina, that said contents are true in substance and in fact, except as to matters stated upon information and belief, and as to those, I believe the same to be true.

Dated: 5-22-19


 Jeff Compton, President
 Blue Casa Telephone, LLC

Subscribed and sworn to before me this 22 day of May, 2019.

(Notary Seal)

See attached
 Notary Public

My commission expires: 1/8/2022

JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

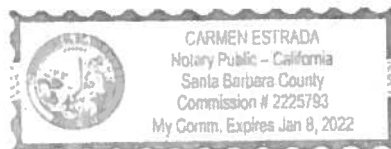
County of SANTA BARBARA

Subscribed and sworn to (or affirmed) before me on

this 22 day of May, 20 19,by Jeff Howard Compton -

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature

C Estrada

(Seal)